

Serial No. 10/791,891

Attorney Docket No. 01-578

REMARKS

The applicant notes with appreciation the acknowledgement of the claim for priority under section 119 and the notice that all of the certified copies of the priority documents have been received.

Counsel for applicant wishes to thank the examiner for the courtesy of the interview on December 22, 2005. The substance of applicant's presentation at the interview is discussed below.

Claims 1 – 6 are pending. The applicant respectfully requests reconsideration and allowance of this application in view of the above amendments and the following remarks.

The examiner is thanked for indicating the allowability of claims 2 and 5 if re-written in independent form and/or to overcome a rejection under 35 USC 112, second paragraph.

Claims 1 – 6 were objected to for use of the designation "capacitive-type." Accordingly, the claims have been amended as suggested in the office action to recite "capacitive" instead. Reconsideration and withdrawal of the objection is respectfully requested.

Claims 1 – 3 were rejected under 35 USC 112, second paragraph, as being indefinite. By way of the above amendment, the applicant has adopted the amended wording phrase including the term "symmetrically formed" as suggested in the office action. Withdrawal of the rejection is therefore respectfully requested.

Claims 1, 3, 4 and 6 were rejected under 35 USC 103(a) as being unpatentable over U.S. Patent No. 6,505,512, Geen et al. ("Geen"). The applicant respectfully requests that this rejection be withdrawn for reasons including the following, which are provided by way of example.

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Independent claim 1 recites in combination, for example, "wirings connecting the fixed electrodes of the plurality of sensor chips and the shared pad, wherein the wirings are symmetrically formed with respect to each other to have substantially the same wiring resistances from the shared pad to the fixed electrodes of the sensor chips." Independent claim 4 recites in combination, for example, "a pair of first wirings connecting the first shared pad to the first fixed electrodes of the first and second sensor chips, respectively, each of the pair of first wirings being formed substantially symmetrically with respect to each other to have substantially the same wiring resistances; and a pair of second wirings connecting the second shared pad to the second fixed electrodes of the first and second sensor chips, respectively, each of the pair of second wirings being formed substantially symmetrically with respect to each other to have substantially the same wiring resistances."

The office action argues that Geen teaches the invention as claimed, except that Geen fails to teach or suggest the "pads" for the interconnected electrodes. The office action argues that Fig. 4 of the present specification teaches "pads" connecting electrodes. To the contrary, Geen fails to teach or suggest the invention, as presently claimed, when the claims are considered as a whole.

The response to the first office action argued that Geen fails to teach or suggest that the wirings are symmetrically formed with respect to wiring resistances from the shared pad to the fixed electrodes of the sensor chips. Paragraph 7 of the present office action now contends that Geen discloses "the wirings between the fixed electrodes 160a and 161b in Fig. 3 are symmetrically formed, and the wiring resistances from the fixed electrodes 160a and 161b to the common node would be substantially the same."

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The examiner incorrectly assumes this from Fig. 3, which is nothing more than a schematic view. The distances of the wirings from the electrodes 160a, 161b to the nodes between the gyros 152a, 152b are clearly different when measured. Moreover, Geen fails to teach or suggest anything about the details of the wirings. Therefore, it is respectfully submitted that Geen fails to teach or suggest at least this element. If the examiner maintains his contention that Geen teaches that the wiring resistances would be substantially the same, he is requested to provide a citation to a specific portion of Geen.

Geen fails to teach or suggest, for example, these elements recited in independent claim 1. It is respectfully submitted therefore that claim 1 is patentable over Geen and/or the other references of record.

For at least these reasons, the combination of features recited in independent claims 1 and 4, when interpreted as a whole, is submitted to patentably distinguish over the prior art. In addition, Geen clearly fails to show other recited elements as well.

With respect to rejected dependent claims 3 and 6, applicant respectfully submits that these claims are allowable not only by virtue of their dependency from independent claim 1 or 4, but also because of additional features they recite in combination.

The applicant respectfully submits that, as described above, the cited prior art does not show or suggest the combination of features recited in the claims. The applicant does not concede that the cited prior art shows any of the elements recited in the claims. However, applicant has provided specific examples of elements in the claims that are clearly not present in the cited prior art. The applicant strongly emphasizes that one reviewing the prosecution history should not interpret any of the examples applicant has described herein in connection with distinguishing over the prior art as limiting to those specific features in isolation. Rather, for the

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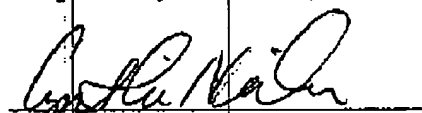
sake of simplicity, the applicant has provided examples of why the claims described above are distinguishable over the cited prior art.

The applicant respectfully requests entry of the present amendment for the following reasons. First, the amendments address the examiner's issues with respect to the claimed invention, and most were unable to be introduced earlier since additional objections/rejections were included in the Final Office Action. Second, the amendments to the claims do not raise new issues requiring further search since the amendments involve adopting the examiner's suggestions from the office action. Third, the applicant respectfully submits that no new matter has been introduced. In addition, the amendments made to the claims are minor changes performed in response to the Examiner's comments. Fourth, the amendments to the claims place the application in better form for appeal by materially simplifying the issues, i.e., correcting formality requirements. Accordingly, the applicant respectfully requests entry of the present Amendment.

In view of the foregoing, the applicant respectfully submits that this application is in condition for allowance. A timely notice to that effect is respectfully requested. If questions relating to patentability remain, the examiner is invited to contact the undersigned by telephone.

Please charge any unforeseen fees that may be due to Deposit Account No. 50-1147.

Respectfully submitted,


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